

COHEN, FRANKEL & RUGGIERO, LLP

ATTORNEYS AT LAW

20 VESEY STREET, SUITE 1200
NEW YORK, NEW YORK 10007
(212) 732-0002 • FAX (212) 293-7224

MARK I. COHEN
PETER M. FRANKEL
LOUIS J. RUGGIERO
MINA KENNEDY
GILLIAN M. FEEHAN*

*ADMITTED IN NJ AND PENDING ADMISSION IN NY

MEMO ENDORSED

35-07 90TH STREET
JACKSON HEIGHTS, NEW YORK 11372
(718) 898-4900 • FAX (718) 898-0093
PLEASE DO NOT REPLY TO THIS OFFICE

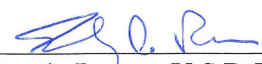
June 18, 2021

VIA ECF

The Honorable Edgardo Ramos
Senior District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

The June 23, 2021 conference is adjourned to August 6, 2021 at 3:30 p.m. Speedy trial time is excluded for June 23, 2021, until August 6, 2021, in the interest of justice.

SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: 6/22/2021
New York, New York

**Re: *United States v. Elvin German and Vanessa Gomez*
21 Cr. 245 (ER)**

Dear Judge Ramos:

Please recall that I represent Mr. Elvin German in his defense of the above-referenced matter. Mr. German is presently scheduled to appear before Your Honor on June 23, 2021 at 3:30 p.m. for a pretrial conference. For the reasons that follow, I write to respectfully request that Your Honor grant a 45-day adjournment of the pretrial conference. This is the defense's first adjournment request in this matter. We have conferred with A.U.S.A. Danielle Kudla and co-counsel Ms. Lorraine Belostock, Esq., and both parties consent to this request.

The defense is in receipt of voluminous discovery in this matter, much of which has been provided to us within the last approximately two weeks. Thus far, we have received approximately 300 GB of discovery materials, and we anticipate that the Government will be producing more discovery in the near future. The defense has been working diligently to review the discovery has been provided to us, but due to the volume, we do not expect to complete this review until after June 23, 2021.

Therefore, I respectfully request a 45-day adjournment of the pretrial conference in the above-captioned matter in order to enable the defense to complete its review of the voluminous discovery in this matter. The defense has no objection to the exclusion of time under the Speedy Trial Act. Thank you for your consideration.

Respectfully submitted,


Mark I. Cohen, Esq.

MIC/gmf

Cc: A.U.S.A. Danielle Kudla (via ECF)
Ms. Lorraine Belostock, Esq. (via ECF)
Mr. Elvin German (via email)

MEMO ENDORSED